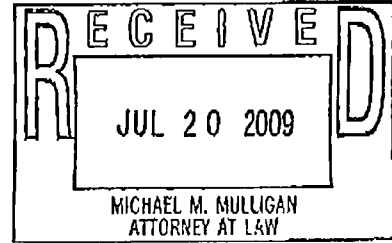


EXHIBIT A

Michael M. Mulligan, Esq.
Attorney at Law
P.O. Box 432
317 Shell Road
Carneys Point, N.J. 08069
(856) 299-2600
FAX: (856) 299-2799
Attorney for the Plaintiff



RYAN MARTIN
Plaintiff

v.

GLOUCESTER COUNTY
CORRECTIONS OFFICERS
FURTAGO, FOX, HICKMAN,
McGLOUGHLIN; GLOUCESTER
COUNTY; GLOUCESTER
COUNTY CORRECTIONS DEPT.
Defendants

SUPERIOR COURT OF NEW JERSEY
GLOUCESTER COUNTY
LAW DIVISION
CIVIL ACTION

DOCKET #: C-1265-09

COMPLAINT & JURY DEMAND

I. PARTIES

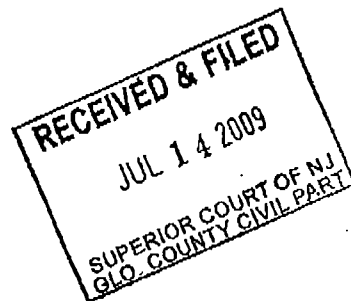
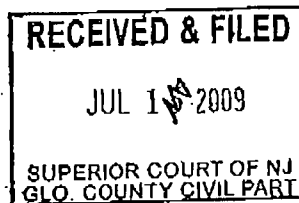
1. Plaintiff Ryan Martin, is an adult male with a present residing in Pitman Borough, Gloucester County, New Jersey.

2. Defendants Furtago, Fox, Hickman and McGloughlin are all present or former Corrections Officers employed by the County of Gloucester at the Gloucester County Corrections Facility, Hunter Street, Woodbury, New Jersey.

3. Gloucester County is a corporate body politic existing according to the laws of the State of New Jersey. The Board of Chosen Freeholders of Gloucester County is a body with legal authority and responsibility to manage the public government affairs Gloucester County, including operation of the Gloucester County Corrections Facility ("Corrections Facility" hereinafter).

4. Upon information and belief, the Gloucester County Corrections Department ("Corrections Department" hereinafter) is an unincorporated division of government of Gloucester County. The Corrections Department staffs and operates the Corrections Facility.

MICHAEL M. MULLIGAN
ATTORNEY AT LAW
317 SHELL ROAD (RT. 813)
P.O. BOX 432
CARNEYS POINT, NEW JERSEY
08069-0432



II. JURISDICTION

5. Plaintiff Ryan Martin brings this action according to 42 U.S.C.A. Sec. 1983, N.J.S.A. 59:1-1 et seq. The New Jersey Superior Court has supplemental jurisdiction of a 42 U.S.C.A. Sec. 1983 action. This Court has primary jurisdiction of a Title 59 Tort Claim Action.

6. All relevant conduct of the Defendants occurred under color of state law and thus is actionable according to 42 U.S.C.A. Sec. 1983. All Defendants are public entity employees, officers or agents according to N.J.S.A. 59:1-1 et seq.

III. VENUE

7. Plaintiff is a Gloucester County, State of New Jersey resident so venue is properly laid in Gloucester County. Defendant Gloucester County may only be sued according to Title 59 is Gloucester County, New Jersey, the place of its public sector activities.

IV. CASE OR CONTROVERCY

8. Plaintiff proceeds based upon an excessive use of force claim against the Defendants. No remedy has been obtained or accorded to the Plaintiff which redresses the harm. The matter is not moot and otherwise is ripe for determination.

COUNT ONE

9. On or about January 22, 2008, the Defendant was present as an inmate at the Corrections Facility, under the supervision of Defendant Corrections Department.

10. At the same time Defendants Furtago, Fox, Hickman and McGloughlin were law enforcement staff at the Corrections Facility with supervisory responsibility over the person of the Plaintiff. At all times Defendants acted under color of authority of the Corrections Department and Gloucester County generally, the entities with legal responsibility to properly operate the Corrections Facility.

11. Defendants Furtago, Fox, Hickman and McGloughlin subjected the Plaintiff to excessive force by mercilessly beating him in violation of Plaintiff's federal and state constitutional rights.

12. The beating objectively viewed amounted to an actionable, unconstitutional invasion of the person of the Plaintiff.

13. No legal immunity applies because Defendants Furtago, Fox, Hickman and McGloughlin intentionally beat the Plaintiff and violated his personal liberty interests. The Defendants knew or should have known their conduct was unreasonable.

MICHAEL M. MULLIGAN
ATTORNEY AT LAW
317 SHELL ROAD (RT. 8130)
P.O. BOX 434
CARNEY'S POINT, NEW JERSEY
08069-0432

14. The unlawful, excessive force utilized cause Plaintiff grievous personal injury, including closed head brain damage which, among other things rendered the Plaintiff unconscious for a substantial duration of time.

WHEREFORE, the Plaintiff seeks exemplary, compensatory and punitive monetary damages, together with an award of attorney's fees reimbursement and lawful costs of suit.

COUNT TWO

15. By this reference the allegations of Count One are repeated, as if same were set forth at length.

16. Defendants Furtago, Fox, Hickman and McGloughlin's actions in beating the Plaintiff establish the intentional torts of common law assault and battery.

17. Plaintiff's previous counsel filed a timely Notice of Tort Claim upon Gloucester County which permits such tort claims to be litigated by this Honorable New Jersey Superior Court.

WHEREFORE, the Plaintiff seeks exemplary, compensatory and punitive monetary damages, together with lawful costs of suit.

COUNT THREE

16. By this reference the allegations of Counts One and Two are repeated, as if same were set forth at length.

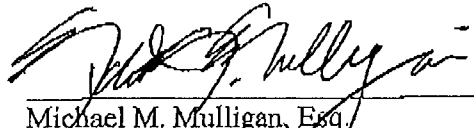
17. The actions of Defendants Furtago, Fox, Hickman and McGloughlin were the subject of a timely tort claims notice. Upon information and belief a sham investigation of the incident by the Gloucester County Prosecutor's Office on behalf of Defendants Gloucester County and the Corrections Department took place given the finding reported to Plaintiff that the incident complaint was found to be baseless.

18. Failing to discipline the Defendants involved constitutes a breach by Gloucester County and the Corrections Department of its legal obligation according to the United States Supreme Court's *Monell* case to properly train, instruct and supervise its agents and employees

WHEREFORE, the Plaintiff seeks exemplary, compensatory and punitive monetary damages, together with lawful costs of suit.

MICHAEL M. MULLIGAN
ATTORNEY AT LAW
317 SHEL ROAD RT. #130
P.O. BOX 432
GARNEYS POINT, NEW JERSEY
08069-0432

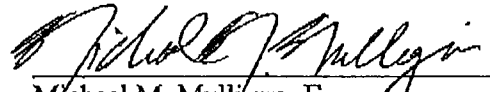
Date: 7/13/09


Michael M. Mulligan, Esq.
Attorney for the Plaintiff

DESIGNATION OF TRIAL COUNSEL

According to the applicable rule of Court, Defendants designate Michael M. Mulligan, Esq., as trial counsel.

Date: 7/13/09

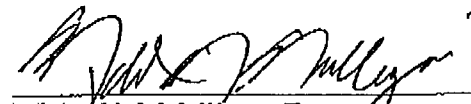

Michael M. Mulligan, Esq.
Attorney for Plaintiff

R. 4:5-1(b)(2) & R. 4:6-1(d) CERTIFICATION

The undersigned certifies that the matter in controversy is not subject to any other pending or contemplated proceedings. Nor should any other party be joined in this proceeding. This answer has been filed in a timely manner.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are determined to be willfully false that I am subject to punishment.


Date: 7/13/09


Michael M. Mulligan, Esq.
Attorney for Plaintiff

JURY DEMAND

Plaintiff demands trial by jury as the finder of fact for all material issues in dispute.

Date: 7/13/09


Michael M. Mulligan, Esq.
Attorney for Plaintiff

MICHAEL M. MULLIGAN
ATTORNEY AT LAW
317 SHELL ROAD EXT. #130
P.O. BOX 422
CARNEY'S POINT, NEW JERSEY
08069-0422

Michael M. Mulligan, Esq.
Attorney at Law
P.O. Box 432
317 Shell Road
Carneys Point, N.J. 08069
(856) 299-2600
FAX: (856) 299-2799
Attorney for the Plaintiffs

RYAN MARTIN	:	SUPERIOR COURT OF NEW JERSEY
Plaintiff	:	GLOUCESTER COUNTY
	:	LAW DIVISION
	:	CIVIL ACTION
v.	:	
	:	DOCKET #: GLO-L-001265-09
GLOUCESTER COUNTY	:	
CORRECTIONS OFFICERS	:	
FURTAGO, FOX, HICKMAN,	:	
McGLOUGHLIN; GLOUCESTER	:	
COUNTY; GLOUCESTER	:	
COUNTY CORRECTIONS DEPT.	:	
Defendants	:	
	:	CERTIFICATION OF SERVICE

I, Samuel J. Leone, Esq., Gloucester County Counsel, being of full age say:

1. This day I received what purports to be a copy of Complaint & Jury Demand, Track Assignment Notice, CIS and original Summons via mail delivered by the United States Postal Service.

2. As County Counsel for Gloucester County I am authorized according to law to accept service of process for all Defendants.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are determined to be willfully false that I am subject to punishment.

Date:

Samuel J. Leone, Esq.
Gloucester County Counsel

MICHAEL M. MULLIGAN
ATTORNEY AT LAW
317 SHELL ROAD RT. 1180
P.O. BOX 432
CARNEYS POINT, NEW JERSEY
08069-0432